

## SAN FRANCISCO BAY AREA WETLANDS ECOSYSTEM

**GOALS PROJECT**

c/o SFEP • 2101 Webster Street, Suite 500 • Oakland, CA 94612  
510-286-1221 • FAX 873-6321

January 6, 1997

Mr. Dick Daniel  
Ecosystem Review Team  
CALFED Bay-Delta Program  
1416 Ninth Street, Suite 1155  
Sacramento, CA 95814

Subject: Comments on CALFED Bay-Delta Program Ecosystem  
Restoration Program Plan Preliminary Working Draft  
Implementation Objectives and Targets

Dear Dick:

I am writing on behalf of the San Francisco Bay Area Wetlands Ecosystem Goals Project. The Goals Project is an interagency effort to identify the kinds, amounts, and distribution of wetland habitats needed to sustain diverse and healthy communities of fish and wildlife resources in the San Francisco Bay Area. The Goals Project's main decision-making body, the Resource Managers Group (RMG), comprises staff from a dozen local, state, and federal resource agencies, many of which are actively involved in the CALFED process. Nearly one hundred biologists and physical scientists provide the RMG technical advice.

On December 19, 1996, the RMG briefly discussed the subject CALFED document. Although we applaud the effort to establish goals for restoring fish and wildlife populations and habitats, we have two primary concerns regarding your draft document: 1) technical and policy concerns regarding the setting of numerical targets for populations and habitats, and 2) the absence of objectives and targets for portions of San Francisco Bay downstream of San Pablo Bay.

We fully recognize the need to establish some kind of measurable goals for fish and wildlife populations and their

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supporting habitats. Our initial approach of setting regional wetlands goals involved establishing population targets for key species and then determining the amount and distribution of habitats necessary to support those populations. However, after many months of discussions regarding the technical difficulties of setting appropriate population targets, the RMG decided to replace this approach with one utilizing scenario-planning through which we will assess how a variety of habitat arrays would affect certain key species. In the coming months, we will use a Geographic Information System developed by the San Francisco Estuary Institute to develop these habitat arrays; we plan to release draft recommendations in the late spring. Given our experiences in trying to set population targets, we are very curious to know more about the process that CALFED used to set targets.

We note that the targets presented in the subject CALFED document are somehow based on population and habitat targets recommended in existing basinwide and local fish, wildlife, and habitat restoration plans. While this may be somewhat more rigorous than pulling targets out of "thin air," we question the scientific methods used to derive the targets. Given the importance of setting appropriate targets, and the long-term implications for ecosystem management in achieving them, we believe the document must provide much more detail regarding the methods for deriving the targets. If CALFED must have targets now, it should better document the process for developing them.

A second and, from our perspective, more problematic aspect of setting targets now involves the potential conflict between the CALFED targets and the wetlands habitat goals the RMG will release later this year. This problem will be most significant in the overlapping geographic regions of the two efforts: in Suisun Marsh and in the San Pablo Bay region. The last thing the owners of private or public lands need is a set of conflicting habitat goals from two "government" efforts. This problem must be addressed by coordinating the goal-setting efforts of CALFED and the Goals Project; ideally, we should release identical goals concurrently for public review and comment. If we are unable to find a way to coordinate adequately, the RMG recommends that CALFED postpone establishing numerical targets for the geographic areas in which our projects overlap until the Goals Project releases its draft recommendations in late spring.

Finally, we recognize that the CALFED process identifies a "Problem Area" comprising the Delta and Suisun Bay/Marsh, and a "Solution Area" that includes the watersheds of the Central Valley and San Francisco Bay. Given the physical and ecological linkages shown during the past decade between the Bay and the Delta, we strongly recommend that CALFED treat all of San Francisco Bay equally as it refines implementation objectives and targets. Implementation objectives and targets should be developed for Central Bay and South Bay, in addition to those developed for San Pablo Bay.

We appreciate the opportunity to provide these comments on the draft document, and we look forward to improving communication between our respective projects in the coming months. If you would like to discuss these comments, please call me at 415 744-1963.

Sincerely,



Michael Monroe  
Co-chair  
Resource Managers Group

cc: RMG members

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